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April 10, 2020

The Honorable Vernon S. Broderick, U.S.D.J.  
United States District Court, S.D.N.Y.  
40 Foley Square  
New York, New York 10007

Re: *The Management Group, LLC v. Holidaynet LLC and Godaddy.com, Inc.*  
1:19-cv-04917 (VSB)


**Plaintiff's Response to Defendant's Reply**

Dear Judge Broderick:

We represent plaintiff The Management Group, LLC ("Plaintiff") in the above action. Defendant Godaddy just filed a misleading letter saying that they have no objection to our request to a enter voluntary dismissal *with prejudice*. To be clear our letter did not ask for prejudice. The withdrawal, Document 46, was duly filed on January 17, 2020, and terminated the action pursuant to F.R.C.P. 41(a)(1)(A)(i) which is a withdrawal of the action *without* prejudice as certain disagreements are preserved for other forums.

Thank you.

Respectfully submitted,

  
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Roger K. Marion, Esq.

cc: Jed M. Weiss, Esq. (*via ecf*)  
Jeffrey Monhait, Esq. (*via ecf*)